

## **EXHIBIT 4**

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

KATHY CLARK, AMY ENDSLEY, SUSAN )  
GRIMMETT, MARGUERIETTE SCHMOLL, )  
AND KEVIN ULRICH, ON BEHALF OF )  
THEMSELVES AND ALL OTHERS )  
SIMILARLY SITUATED, )

Plaintiffs, )

vs. )

CENTENE CORPORATION, CENTENE )  
COMPANY OF TEXAS, L.P., AND )  
SUPERIOR HEALTHPLAN, INC., )

Defendants. )

Civil Action No. 1:12-CV-00174-SS

JURY DEMANDED

**DEFENDANT'S OBJECTIONS AND ANSWERS TO PLAINTIFFS'  
FIRST SET OF INTERROGATORIES  
TO DEFENDANT CENTENE CORPOPRATION**

COMES NOW Defendant Centene Corporation (hereafter "Centene" or "Defendant") by  
and through its counsel, and pursuant to Rule 33 and 26(e)(1)(A) of the Federal Rules of Civil  
Procedure, submits its Answers and Objections to Plaintiff's First Set of Interrogatories as  
follows:

---

**INTERROGATORY NO. 6**

Identify by name, last known address, phone number, e-mail address, social security number, job title and dates of employment with Defendant, all persons who have been employed by Defendant since February 22, 2009, who performed the jobs listed in Interrogatory No. 1 (and/or jobs with substantially similar duties) and who have been classified as exempt and not paid overtime for any hour worked over forty in any work week.

**ANSWER:**

**Objection. Centene objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. No class has been certified in this case at this time and Plaintiffs' efforts to use this discovery as a method to discover other possible plaintiffs is improper at this stage of the litigation. Further, Centene objects on the grounds that it has no employees.**

---

Respectfully submitted,

BY: /s/ Michael J. Golden

Michael J. Golden  
State Bar No. 24032234

BOULETTE & GOLDEN LLP  
2801 Via Fortuna, Suite 350  
Austin, TX 78746  
512.732.8902  
512.732.8905 (facsimile)  
mike@boulettegolden.com

Robert A. Kaiser  
Jovita M. Foster  
Jeremy M. Brenner  
ARMSTRONG TEASDALE LLP  
7700 Forsyth Blvd., Suite 1800  
St. Louis, Missouri 63105  
314.621.5070  
314.621.5065 (facsimile)  
rkaiser@armstrongteasdale.com  
jfoster@armstrongteasdale.com  
jbrenner@armstrongteasdale.com

ATTORNEYS FOR DEFENDANTS

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the above and foregoing has been served upon all counsel of record via hand delivery on this 1st day of August 2012, as follows:

David G. Langenfeld  
Dunham & Jones, P.C.  
1800 Guadalupe Street  
Austin, Texas 78701  
512.777.7777 (Telephone)  
512.340.4051 (Facsimile)

/s/ Michael J. Golden

Michael J. Golden  
Counsel for Defendants